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May 8, 1991

Mr. James P. Harper
Remedial Project Manager
UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
Region III
841 Chestnut Building
Philadelphia, Pa. 19107

Re: Strasburg Landfill
Newlin Township, Chester County, PA

Dear Mr. Harper:

I am in receipt of letters sent by you dated April 18, 1991 to Newlin Corporation 25% Interest, Richard Winn - Principal, and to Somerset Strippers of Virginia, Inc. 25% Interest, Joseph Martosella, President, regarding the Proposed Plan for interim remedies at the Strasburg Landfill.

I am writing to call your attention to serious and fundamental mistakes set forth in the "site background" section of the Proposed Plan. Contrary to what has been set forth by EPA, the permittee, owner, and operator of the site was Strasburg Associates. Neither Newlin Corporation, Richard Winn, Somerset Strippers of Virginia, nor Joseph Martosella were the permittee, owner, or operator of the Landfill.

The entity to which the site background section refers -- Strasburg Landfill Associates -- was a joint venture owning the land underneath the Landfill and leasing the land to Strasburg Associates, the permittee, owner, and operator of the Landfill.

The interest of Newlin Corporation, and the interest of Somerset Strippers of Virginia was a twenty-five (25%) percent interest in the joint venture, and not in Strasburg Associates.

AR301387

Mr. James P. Harper
Page -2-
May 8, 1991

In addition, contrary to assertions in the site background section, the Landfill was ordered closed in May of 1983 because it had reached its capacity.

Since neither Newlin Corporation nor Somerset Strippers of Virginia nor Mr. Winn nor Mr. Martosella were involved in the operation of the Landfill, I cannot represent whether your figures for accepted wastes and sludges are accurate.

Should you desire documentary verification of the assertions set forth herein, please let me know and I will be happy to forward them to you.

Very truly yours,

ABRAMSON, COGAN, KOGAN,
FREEDMAN & THALL, P.C.



BRUCE L. THALL

BLT:df
cc: Mr. Richard Winn
Mr. Joseph Martosella

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